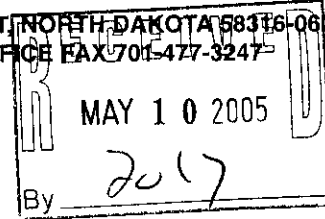


TURTLE MOUNTAIN HOUSING AUTHORITY, T.D.H.E.
A TRIBALLY DESIGNATED HOUSING ENTITY

P.O. BOX 620 • 1/4 MILE SOUTH ON HWY. 5 • BELCOURT, NORTH DAKOTA 58316-0620
TELEPHONE 701-477-5673 ADMINISTRATION OFFICE FAX 701-477-3247



May 2, 2005

Mr. Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550-17th Street NW
Washington, D.C. 20429

RE: RIN 3064-AC89

To Whom It May Concern:

The Turtle Mountain Housing Authority (TMHA) urges enhancement of proposed changes to the Community Reinvestment Act (CRA) regulations so that banks do not reduce: branches, or community development loans and investments to low and moderate income communities. While your proposal is an improvement from the one you issued in the fall, serious issues still remain. TMHA believes the current exam structure is the most effective for maximizing the level of community development financing. If you move to a new exam format, please ensure that significant declines of community development financing do not occur.

TMHA is also concerned that deleting a separate test for services will result in CRA exams no longer holding mid-size banks accountable for the provision of bank branches and low cost accounts in low and moderate income communities. Payday lending and other high cost credit has increased in Native American Indian communities in the last several years, and the last thing our community needs is CRA exams that no longer look at the number of bank branches in traditionally underserved communities. Please add the provision of bank branches as a clear factor on your proposed CRA exams for mid-size banks

In addition, TMHA urges you to drop your proposed elimination of public data disclosure requirements regarding community development, and small business and small farm lending. The only way to hold mid-size banks accountable for providing credit to small firms, and for affordable housing/community development to survive is if the CRA data remains publicly available. Further, the requirement for community development in rural areas must benefit low and moderate income areas and distressed communities must not change. Thank you for your consideration of my comments.

Sincerely,

Ron Peltier,
Executive Director

Cc. National Community Reinvestment Coalition